

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

Criminal No. 11-cr-10212-JLT

- | | | |
|------------|------------------------------|---|
| 1. | JOHN WILLIS |) |
| | a/k/a "Bac Guai John" |) |
| 2. | BRANT WELTY |) |
| 3. | PETER MELENDEZ |) |
| | a/k/a "Shrek" |) |
| 4. | AIBUN ENG |) |
| 5. | BRIAN BOWES |) |
| 6. | KEVIN BARANOWSKI |) |
| 7. | MICHAEL CLEMENTE |) |
| | a/k/a "Ricky Martin" |) |
| 8. | MICHAEL SHAW |) |
| 9. | MARK THOMPSON |) |
| 10. | STEVEN LE |) |
| | a/k/a "Little Stevie" |) |
| 11. | VINCENT ALBERICO |) |
| 12. | BRIDGET WELTY |) |
| 13. | ANEVAY DUFFY |) |
| | a/k/a "Homegirl" |) |
| | Defendants. |) |

UNITED STATES' SECOND FORFEITURE BILL OF PARTICULARS

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Second Forfeiture Bill of Particulars.

On May 26, 2011, a federal grand jury sitting in the District of Massachusetts returned an Indictment charging Defendants, in Count One, with Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone, Marijuana and Human Growth Hormone, in violation of 21 U.S.C. § 846. The Indictment also alleges that upon conviction of the offense in violation of 21 U.S.C. § 846 set forth in Count One, Defendants jointly and severally, shall forfeit to the United States, pursuant to 21 U.S.C. §853: (1) any and all property constituting or derived from any proceeds

obtained directly or indirectly as a result of the charged offense; and (2) any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense.

Pursuant to, and without limiting in any manner the Indictment's Drug Forfeiture Allegation, the United States hereby gives notice that it is seeking forfeiture of, among other assets, the following property, all of which was seized on May 27, 2011, from the Wormwood Street, Dorchester, apartment occupied by Defendants Brant and Bridget Welty:

(a) the following firearms, ammunition, and accessories, collectively identified for tracking purposes as Asset ID No. 11-FBI-005041:

Handguns, some with ammunition and/or magazines

Colt Diamondback .38 caliber revolver, s/n D19274;

Glock Model 19, 9 mm. pistol, s/n TE664US, with magazine and 13 rounds of ammunition;

Interarms Walther PPKIS .380 caliber pistol, s/n 5076186;

LW Seecamp California Edition .32 caliber pistol, s/n 046642, with 6 round magazine;

Sig Sauer Model SP2340 pistol, s/n SP0012952, with 2 magazines containing 10 rounds each;

Smith & Wesson Model 640, .38 caliber revolver, s/n CEN4731;

Smith & Wesson Model 27, .357 caliber revolver, s/n N164836;

Smith & Wesson Model 66, .357 caliber revolver, s/n 6K82887;

Smith & Wesson SW4OVE .40 caliber handgun, s/n RBT4168, with 2 magazines containing 10 rounds each;

Other Firearms

Remington Model 870 12-gauge Shotgun, s/n A740380M;

DPMS Panther Arms A-15 Model rifle, s/n N0005955, with one magazine;

Uzi Model B 9 mm. rifle, s/n 65661, with 4 magazines, bag, and barrel;

Other Ammunition

75 rounds of .32 caliber ammunition;

2 boxes of Wolf brand .223 caliber rounds, totaling 40 rounds;

270 rounds of .38 caliber ammunition;

63 rounds of .357 caliber ammunition;

4 rounds of .40 caliber ammunition;

93 rounds of .40 caliber ammunition;

80 rounds of .380 caliber ammunition; and

138 Rounds of 9 mm. ammunition;

(b) US Armor body armor, s/n BA-US-61797003; and

(c) certain items, described below, constituting some of the seized watches and jewelry previously collectively identified for tracking purposes as Asset ID No. 11-FBI-004758:

Men's gold-tone Movado watch;

Men's 14k yellow gold overlay stainless steel Omega watch, Constellation model;

Men's stainless steel Baume & Mercier watch, Copeland Sport model 65366, s/n 5270762;

Men's stainless steel Tag Heuer watch with 11 single-cut diamond dot markers, model WJ1114-0, s/n YP7640;

Men's stainless steel Tag Heuer watch, model CT1110, s/n MZ9436;

Men's stainless steel & 18k yellow gold 8" bracelet; and

Ladies'18k yellow gold cluster ring, with 10 full-cut diamonds and 1 dark blue sapphire.

Respectfully submitted,

CARMEN M. ORTIZ

United States Attorney

By: /s/ Richard L. Hoffman

TIMOTHY E. MORAN

RICHARD L. HOFFMAN

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Dated: November 17, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Court Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Richard L. Hoffman

RICHARD L. HOFFMAN

Assistant U.S. Attorney

Dated: November 17, 2011